

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : SEALED  
: SUPERSEDING INDICTMENT  
: S1 20 Cr. 351 (SHS)  
- v. - :  
ROBERT NEWLAND, :  
a/k/a "Geoffrey Robert :  
Newland," :  
Defendant. :  
----- X

COUNT ONE  
**(Wire Fraud)**

The Grand Jury charges:

1. From in or about 2016 up to and including in or about November 2019, in the Southern District of New York and elsewhere, ROBERT NEWLAND, a/k/a "Geoffrey Robert Newland," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, for the purpose of financing a co-conspirator's art business, NEWLAND, through interstate email communications, including communications to and

from the Southern District of New York, and other means, provided false information and false documents and made material omissions regarding the sale, ownership and provenance of artworks, and thereby obtained funds by means of interstate and foreign wire transfers to, from and through Southern District of New York, from collectors, investors, and financial lenders.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT TWO

**(Conspiracy to Commit Wire Fraud)**

The Grand Jury further charges:

2. From in or about 2016 up to and including in or about November 2019, in the Southern District of New York and elsewhere, ROBERT NEWLAND, a/k/a "Geoffrey Robert Newland," the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

3. It was a part and an object of the conspiracy that ROBERT NEWLAND, a/k/a "Geoffrey Robert Newland," the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire,

radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code Section 1343, to wit, for the purpose of financing a co-conspirator's art business, NEWLAND, through interstate email communications and other means, would and did provide false information and false documents and made material omissions regarding the sale, ownership and provenance of artworks, and thereby fraudulently obtained funds by means of interstate and foreign wire transfers from collectors, investors, and financial lenders.

(Title 18, United States Code, Section 1349.)

**FORFEITURE ALLEGATION**

4. As a result of committing the offenses alleged in Count One and Two of this Indictment, ROBERT NEWLAND, a/k/a "Geoffrey Robert Newland," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

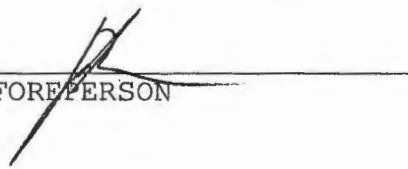
**Substitute Asset Provision**

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982, 1029; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
AUDREY STRAUSS  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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S1 20 Cr. 351 (SHS)

(18 U.S.C. §§ 1343, 1349, and 2.)

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AUDREY STRAUSS  
United States Attorney

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Foreperson

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